

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALICIA STREET, et al.,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:19-CV-02590-CDP
)	
LT. COL. LAWRENCE O'TOOLE, et al.,)	
)	
Defendants.)	

**CONSENT MOTION TO EXTEND DEADLINES TO FILE
AMENDED COMPLAINT, MOTIONS TO DISMISS,
AND MOTION FOR CLASS CERTIFICATION**

With consent of Defendants, Plaintiffs move the Court to extend Plaintiffs' deadline to file an amended complaint, Defendants' deadline to file motions to dismiss, and Plaintiffs' deadline to file a motion for class certification. In support of this motion, Plaintiffs state as follows:

1. On November 13, 2019, the Court entered the Stipulated Order for Preliminary Schedule and Procedure (Doc. No. 10), ordering Plaintiffs to file an amended complaint by December 15, 2019, ordering Defendants to file their motions to dismiss by January 15, 2020, and ordering Plaintiffs to file their motion for class certification by the end of June 2020.

2. Since, the parties have endeavored to identify any Defendants who should not be named in this suit because they had no command role, no physical presence at or near Tucker and Washington on the night of September 17, 2017, and no liability for the injuries Plaintiffs allege. However, the parties' efforts are ongoing.

3. The parties anticipate significant progress in Plaintiffs' voluntary dismissal of the appropriate Defendants if the parties receive one-month extensions on the aforementioned amendment and motion deadlines.

4. In light of the information provided by Defendants, Plaintiffs intend to file an amended complaint and streamline the claims in the case to make it more efficient. However, given the press of other business and the holiday season, Plaintiffs require additional time to prepare the amended pleading.

5. Plaintiff requests that the Court extend Plaintiffs' deadline to file an amended complaint to January 15, 2020, extend Defendants' deadline to file motions to dismiss to February 14, 2020, and extend Plaintiffs' deadline to file a motion for class certification to July 31, 2020.

WHEREFORE, Plaintiffs respectfully request that the Court extend the deadlines to file the amended complaint, motions to dismiss, and motion for class certification, as stated above.

Date: December 12, 2019

Respectfully submitted,

/s/ Kiara N. Drake

Javad M. Khazaeli, #53735(MO)

James R. Wyrsh, #53197(MO)

Kiara N. Drake, #67129(MO)

Khazaeli Wyrsh, LLC

911 Washington Avenue, Suite 211

St. Louis, MO 63101

(314) 288-0777

javad.khazaeli@kwlawstl.com

james.wyrsh@kwlawstl.com

kiara.drake@kwlawstl.com

Attorneys for Plaintiff